

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re: Vincent E. Harris
Janet L. Harris

Case Number 17-35621-KRH

Chapter 13

Debtors

Address: 1304 Poco Dr Richmond, VA 23235

SSN: xxx-xx- 9499 and 3082

OBJECTION TO PROOF OF CLAIM

COMES NOW, Vincent E. Harris and Janet L. Harris, (“Debtors”), by counsel, and pursuant to 11 U.S.C. Rule 3007, Objection to Claim(s), Debtors object to claim numbers 3 filed by Toyota Motor Credit Corporation.

1. Debtors filed for protection under Chapter 13 of U.S.C. Bankruptcy Code on November 10, 2017.
2. On December 11, 2017, Toyota Motor Credit Corporation, filed secured claim number 3.
3. On December 12, 2018, Toyota Motor Credit Corporation amended the claim to \$5,939.25, five thousand nine hundred thirty-nine dollars and twenty-five cents.

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Chapter 13 Debtors

4. Debtors object to claim number 3, as they believe that Toyota Motor Credit Corporation, had been more diligent in selling the vehicle the deficiency balance would have been significantly lower.
5. The Debtors are requesting that claim number 3 be reduced to \$1,000.00, two thousand and five hundred dollars and zero cents as this is a fairer and more appropriate price.

WHEREFORE, Debtors request that the Court sustain the objection.

February 12, 2021

RESPECTFULLY SUBMITTED

Vincent E. Harris
Janet L. Harris

By: /s/: Joseph Massie, III
Joseph Massie, III
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Chapter 13 Debtors

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2021, I sent, electronically, or mailed a true and exact copy of the foregoing **Objection to Proof of Claim** to all necessary parties.

February 12, 2021

RESPECTFULLY SUBMITTED

Vincent E. Harris

Janet L. Harris

By: /s/: Joseph Massie, III

Joseph Massie, III

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Chapter 13 Debtors

Certificate of Mailing

Toyota Motor Credit Corporation
c/o Becket & Lee, LLP
PO Box 3001
Malvern, PA 19355-0701

American Express Trs
Po Box 297871
Fort Lauderdale, FL 33329

Amex
Correspondence
Po Box 981540
El Paso, TX 79998

Barclays Bank Delaware
100 S West St
Wilmington, DE 19801

Cap1/dbarn
Capital One Retail Srvs/Attn: Bankruptcy
Po Box 30258
Salt Lake City, UT 84130

Capital One
Attn: Bankruptcy
Po Box 30253
Salt Lake City, UT 84130

Capital One
Attn: General Correspondence/Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Cash Net USA
P.O .Box 643990
Cincinnati, OH 45264

Chase Card
Attn: Correspondence Dept

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Case Number 17-35621-KRH

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Po Box 15298
Wilmington, DE 19850

Citibank / Sears
Citicorp Credit Services/Attn: Centraliz
Po Box 790040
Saint Louis, MO 63179

Citibank/The Home Depot
Citicorp Cr Srvs/Centralized Bankruptcy
Po Box 790040
St Louis, MO 63129

Conrad Acct
476 W Vermont Ave
Escondido, CA 92025

Dell Financial Services
Attn: Bankruptcy
Po Box 81577
Austin, TX 78708

Discover Financial
Po Box 3025
New Albany, OH 43054

Henrico Doctor's Hospital
P.O. Box 13620
Richmond, VA 23225

Mid America Bank & T
121 Continental Dr Ste 1
Newark, DE 19713

Midland Funding
Attn: Bankruptcy
Po Box 939069
San Diego, CA 92193

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Case Number 17-35621-KRH

Chapter 13 Debtors

Ocwen Loan Servicing, Llc
Attn: Research/Bankruptcy
1661 Worthington Rd Ste 100
West Palm Bch, FL 33409
Office of US Trustee
701 E. Broad Street
Suite 4300
Richmond, VA 23219

Old Point National Ban
1 W Mellen St
Hampton, VA 23663

Suzanne E. Wade
7202 Glen Forest Dr, Ste 202
Richmond, VA 23226

Synchrony Bank
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/ JC Penneys
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/Amazon
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/Sams Club
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896

Synchrony Bank/Walmart
Attn: Bankruptcy

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Po Box 965060
Orlando, FL 32896

Toyota Motor credit Corp
Po Box 8026
Cedar Rapids, IA 52408

Tricom Management
4025 E La Palma Avenue # 1 101
Anaheim, CA 92807

Wyndham Vacation Ownership
6277 Sea Harbor Dr
Orlando, FL 32821

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